

SEALED**FILED****UNITED STATES DISTRICT COURT**

for the

Western District of Texas

January 19, 2022

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: Marlene Villarreal
DEPUTY

United States of America

v.

Alicia PEREZ-Ramirez

Case No. EP:22-M-00107-LS

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 06/04/2020 - 01/18/2022 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

Title 21 USC 846

Attempt or Conspiracy to Possesses with Intent to Distribute; Cocaine:
Approximately 1.1 kilograms ; Heroin: Approximately 2.2 kilograms

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.Complaint sworn to telephonically on
January 19, 2022 at 04:46 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**
~~Sworn to before me and signed in my presence.~~Date: 01/19/2022City and state: El Paso, TX*Complainant's signature*

Irma Gamez, Special Agent

Printed name and title*Judge's signature*

United States Magistrate Judge

Printed name and title

ATTACHMENT A

I, Irma Gamez, am a duly sworn Special Agent with the Drug Enforcement Administration (“DEA”), having been so employed since September 2015. While employed as a Special Agent with the DEA, I received specialized training in drug investigations and was designated by the Attorney General of the United States of America to be empowered with Title 21 authority, which authorizes me to seize and arrest anyone for violations of the Controlled Substance Act. I make this affidavit, in part, based on my personal training, experience, and personal knowledge derived from my participation in this investigation, and, in part, based upon information from other DEA special agents and other law enforcement officers, agents and agencies in the United States.

FACTS

This investigation is based on information from my own investigation and related investigations conducted by DEA and FBI El Paso Division. In June 2020, DEA Agents developed a cooperating defendant (CD) that worked for a drug trafficking organization (DTO) operating in Juarez, Mexico and El Paso, Texas. On June 4, 2020, agents seized approximately 1.1 kilograms of heroin from the CD during a consensual search of a residence. Through debriefs of the CD, agents identified Alicia PEREZ-Ramirez as a facilitator operating in Juarez, MX and El Paso, TX and the boss of the CD. The CD informed agents that the CD was to store the heroin until the CD received further instructions from PEREZ-Ramirez. On August 24, 2020, PEREZ-Ramirez instructed the CD to deliver the bundle(s) of illegal drugs that were in the CD’s possession to a drug courier in El Paso, TX. These phone calls and text messages between PEREZ-Ramirez and the CD were recorded by agents. At this time, agents intended to conduct a controlled delivery operation in which the CD delivered one (1) bundle of “sham” heroin to a drug courier in El Paso, TX. However, the CD failed to inform agents that the CD was in possession of two additional bundles of illegal drugs that agents did not locate on June 4, 2020, during the search of the residence.

On August 25, 2020, the CD was provided one bundle of “sham” heroin by agents to deliver to a drug courier in El Paso, TX. However, during the operation, the CD delivered two additional bundles (not including the “sham” provided by agents) containing illegal drugs without knowledge or approval from the agents. This transaction was observed and surveilled by DEA and FBI agents. Agents subsequently conducted a traffic stop of the drug courier which resulted in the seizure of approximately 1.1 kilograms of heroin and 1.1 kilograms of cocaine. The CD is cooperating in the hopes of receiving leniency in a future criminal prosecution for the CD’s drug trafficking activities.

In addition to the abovementioned facts, through the course of the investigation, agents have obtained various recorded phone calls and text messages between PEREZ-Ramirez and an undercover agent (UC) discussing the logistics of a drug related transaction. Agents also seized

U.S currency that PEREZ-Ramirez gave to a co-conspirator as form of payment for the successful delivery of drugs.

Prosecution of this case was accepted by Assistant United States Attorney Kyle Myers.


DEA Special Agent Irma Gamez



U.S. Magistrate Judge